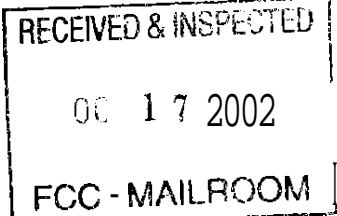


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Sierra Grande Broadcasting
PO Box 51
Des Moines, New Mexico 88418-0051

October 9, 2002

Federal Communications Commission
445 Twelfth Street, S. W.
Washington, DC 20554

Reference MM 02-166

I have not given up my claim for Salina, Utah 276C as counsel for Millcreek Broadcasting, L.L.C. "Millcreek" has claimed I am tired of attempting to find a middle ground, when I just kept losing. I have just realized that the counterproposal for Millcreek, which has no rule making number, and that it is a bad counterproposal for a good proposal for a second local channel for Ketchum, Idaho (MM 02-14)

As far as I know the FCC has yet to put anything about the counterproposal into any form of a notice of proposed rule making. If and when the FCC does make the counterproposal to MM 02-14, into a notice of proposed rule making, I will fight the counterproposal to the best of my ability.

It is my belief that if you are going to counterproposal a proposal, you need to give the group of the original proposal something that is at least neutral to positive as an incentive for the original party to accept the counterproposal. Enclosed are engineering worksheets for an unsubmitted proposal that I had considered for Grand Junction, Colorado. In order for the allotment to go into the Grand Junction area, the vacant Dinosaur, Colorado allotment would need to be moved to another channel. The Dinosaur allotment is waiting for its window for applications for construction permits to open. My counterproposal would have allowed the

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winner of the Dinosaur Class C1 construction permit to upgrade to Class C, if they wanted to.

Millcreek, et al, has counter proposed an allotment that is negative for me. My proposed Salina, Utah 276C allotment was only site restricted by KPEB, 276C3, Huntsville, Utah when I submitted my proposal. There are three peaks (Mount Terrill, Signal Peak and White Pine Peak) in excess of three-thousand meters above mean sea level that my proposed allotment could go on. Millcreek, et al, has counter proposed that I accept a site restriction, where seven out of eight radials used to determine HAAT go up over mountains. The only positive elevation radial would have been the one in the direction of Salina. What their engineer claimed would be a Class C allotment would never be more than a Class C1 facility.

Since I never intend to submit an application for construction permit for the counter proposed Salina, Utah 300C allotment, as is, I do not have the 7.5' maps of the area that the counterproposal wants me to build in. From the map that I copied from the FCC web site, and my USGS Utah state map, it looks like their engineer selected a plateau, on the northeast slope of Mount Belknap, that is about four-hundred-fifty meters, in elevation, above the Sevier River.

I will remind counsel for Mr. Flinn that 47 CFR 73.3598(e) does not allow for an extension of his construction permit for Huntsville, Utah, 276C3. A counterproposal is not an act of God. Mr. Flinn is already over one-half of the way through his construction period. When Mr. Flinn applied for the construction permit, it was with no guarantee that the station would ever be moved, or upgraded. The present Coalville (223C3), and Huntsville (276C3) allotments are on image channels. It took me fifteen months to get an uncontested FM allotment.

A handwritten signature in black ink, appearing to read "Willison H. Gormly". The signature is written in a cursive, slightly slanted style.

Willison H. Gormly

Sierra Grande Broadcasting Grand Junction, Colorado 248CØ FM Allocation

City of License	State	Call Sign	Channel	Class	Latitude				Middle latitude			Longitude			
					Degrees	Minutes	Seconds	Decimal	Degrees	Radians	Degrees	Minutes	Seconds	Decimal	
Grand Junction	Colorado	Proposed station	248	∞	39	6	0	39.1	39.1	0.6824	108	27	0	108.45	
Grand Junction	Colorado	City			39	5	35	39.093	39.0965	0.6824	108	35	51	108.6	
Co-channel															
Clifton	Colorado	MM 99-28	248	C2	38	55	24	38.923	39.0117	0.6809	108	18	56	108.32	
Montrose	Colorado	K248AE	248	D	38	23	16	38.388	38.7439	0.6762	107	40	28	107.67	
Olatha	Colorado	MM 99-28	248	C2	38	44	3	38.734	38.9171	0.6792	108	8	2	108.13	
Poncha Springs	Colorado	MM 99-150	248	A	38	30	42	38.512	38.8058	0.6773	106	4	42	106.08	
Richfield	Utah	KLGL	248	C	39	19	23	39.323	39.2115	0.6844	111	46	23	111.77	
First adjacent channels															
Dinosaur	Colorado	MM 99-149	247	C1	40	14	42	40.245	39.6725	0.6924	109	0	30	109.01	
Lake City	Colorado	Proposed station	247	A	38	1	47	38.03	38.5649	0.6731	107	18	52	107.31	
Aspen	Colorado	KSPN-FM	249	C3	39	13	33	39.226	39.1629	0.6835	106	50	0	106.83	
Avon	Colorado	KZYZ	249	C2	39	38	5	39.635	39.3674	0.5871	106	26	47	106.45	
East Salt Creek	Colorado	K249BX	249	D	39	36	1	39.5	39.3501	0.6863	108	47	42	108.8	
Second adjacent channels															
Moab	Utah	KCYN	246	C1	38	31	38	38.527	38.8136	0.6774	109	17	12	109.29	
Cortez	Colorado	KISZ-FM	250	∞	37	21	48	37.363	38.2317	0.6673	108	9	0	108.15	
Third adjacent channels															
Meeker	Colorado	KAYW	251	∞	40	2	24	40.04	39.57	0.6906	107	55	0	107.92	
Image channels															
Undefined															

Sierra Grande Broadcasting Grand Junction, Colorado 248CØ FM Allocation

Call Sign	Kilometers per degree latitude	Kilometers per degree longitude	North South distance km	East West distance km	Distance km	Required seperation km	Direction degrees	Remarks
Proposed station City	111.01524 111.01517	86.50656 86.5108	0 0.77094	0 12.76034	0 12.78		267.3	
MM 99-28 K248AE	111.01353 111.00837	86.6144 86.94004	19.61239 79.06263	11.64482 67.42683	22.81 103.91	Counter Proposial	142.73 132.56	
MM 99-28 MM 99-150 KLGL	111.01171 111.00956 111.01739	86.72964 86.86488 86.37011	40.61178 65.31062 24.76305	27.4162 206.01454 287.01267	49 216.12 288.08	Counter Proposial 215 281	139.17 103.93 273.84	
MM 99-149 Proposed station KSPN-FM KZYR K249BX	111.02831 111.00492 111.01645 111.0204 111.02007	85.80265 87.1567 86.42963 86.17891 86.20007	127.12512 118.8061 13.96957 59.36507 55.54087	47.90648 98.97127 139.7279 172.66902 29.73802	135.85 154.63 140.42 182.59 63	196 152 163 176	334 133.3 85.55 75.06 325.41	Move to 295C1 Also listed on 276A
KCYN KISZ-FM	111.00971 110.99853	86.85544 87.55764	63.5839 192.76745	72.66905 26.26729	96.56 194.55	94 96	235.6 170.2	
KAYW	111.02433	85.92931	104.36287	45.82897	113.98	96	29.57	

Sierra Grande Broadcasting

Dinosaur, Colorado

295C1 FM Allocation

City of License	State	Call Sign	hanne	Class	Latitude				Middle latitude		Longitude			
					Degrees	Minutes	Seconds	Decimal	Degrees	Radians	Degrees	Minutes	Seconds	Decimal
Dinosaur	Colorado	MM 99-149	295	C1	40	14	42	40.245	40.245	0.70241	109	0	30	109.008
<u>Co-channel</u>														
Brigham City	Utah	KRAR	295	C	41	15	27	41.2575	40.7513	0.71124	112	26	24	112.44
<u>First adjacent channels</u>														
Grand Junction	Colorado	BNPL200101166AD	294	L1	39	3	57	39.0658	39.6554	0.69212	108	33	42	108.562
Parachute	Colorado	BNPL200101166AD	294	L1	39	26	12	39.4367	39.8408	0.69535	108	4	6	108.068
Rifle	Colorado	BNPL200101166AD	294	L1	39	31	49	39.5303	39.8876	0.69617	107	46	33	107.776
Aspen	Colorado	KPVW	296	c 3	39	18	56	39.3156	39.7803	0.6943	106	57	32	106.959
Rangely	Colorado	K296BQ	296	D	40	3	36	40.16	40.2025	0.70167	108	57	12	108.953
Huntington	Utah	MM 99-125	296	C2	39	19	36	39.3267	39.7858	0.69439	110	57	50	i10.964
<u>Second adjacent channels</u>														
Olathe	Colorado	MM 98-188	293	C	38	37	3	38.6175	39.4313	0.68821	107	58	33	107.976
Superior	Wyoming	MM 98-109	293	C	41	45	12	41.77	41.0075	0.71572	108	58	12	100.97
Hayden	Coiorado	KRMR	297	C2	40	31	16	40.5211	40.3831	0.70452	107	17	46	107.296
<u>Third adjacent channels</u>														
<u>Image channels</u>														
Montrose	Colorado	KSTR-FM	241	C(0)	38	52	40	38.8778	39.5614	0.69048	108	13	33	108.226

Sierra Grande Broadcasting Dinosaur, Colorado 295C1 FM Allocation

Call Sign	Kilometers per degree latitude	Kilometers per degree longitude	North South distance km	East West distance km	Distance km	Required seperation km	Direction degrees	Remarks
MM 99-149	111.03743	85.09014	0	0	0			Move from 247C1
KRAR	111.0473	84.45296	112 43539	289.81441	310.86	270	286.44	
BNPL200101166ADC	111.02598	85.82378	130 91813	38.33462	136.42	100	159.25	
BNPL200101166ADB	111.02958	85.59404	89 74891	80.4584	120.53	100	130.69	
BNPL200101166ADA	111.03049	85.5359	79 35596	105.423	131.95	100	120.11	
KPVW	111.0284	85.66917	103 19473	175.5742	203.66	144	114.39	
K296BQ	111.03661	85.14332	9 43811	4.68288	10.53	133	147.03	
MM 99-125	111.02851	55.66228	101 96118	167.51735	196.11	158	244.85	
MM 98-188	111.02164	86.10033	180 68772	88.89859	201.37	105	147.61	
MM 98-109	111.0523	84.12792	169 35476	3.2249	169.39	105	1.44	
KRMR	111.04012	84.91704	30 65941	145.39684	148.59	79	80.84	
KSTR-FM	111.02416	85.93994	151.7947	67.248	166.02	37	150.22	